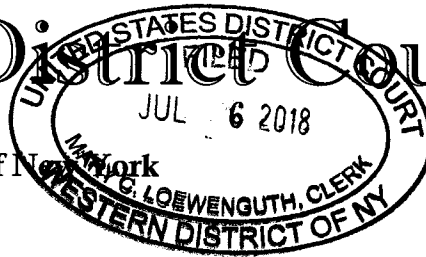


United States District Court

for the
Western District of New York



United States of America

v.

Case No. 18-MJ- 4102

SEAN P. BLACKWELL

Defendant

CRIMINAL COMPLAINT

I, CARLTON TURNER, Task Force Officer with the United States Federal Bureau of Investigation, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about and in between April 30, 2018 and June 6, 2018, in the Western District of New York, the defendant **SEAN P. BLACKWELL** violated Title 18 U.S.C. §§ 2252A(a)(2)(A) and 2252A(a)(5)(B), offenses described as follows:

the defendant did knowingly distribute and possess child pornography that had been that had been shipped or transported using any means or facility of interstate or foreign commerce or had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2)(A), and Title 18, United States Code, Section 2252A(a)(5)(B).

This Criminal Complaint is based on these facts:

SEE ATTACHED AFFIDAVIT OF CARLTON TURNER, T.F.O., F.B.I.

☒ Continued on the attached sheet.

Complainant's signature

CARLTON TURNER, T.F.O., F.B.I.

Printed name and title

Sworn to before me and signed in my presence.

Date: July 6, 2018

Judge's signature

City and State: Rochester, New York

MARIAN W. PAYSON, United States Magistrate Judge

Printed name and title

18.pj-4102

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF MONROE) ss:
CITY OF ROCHESTER)

CARLTON TURNER, having been first duly sworn, deposes and states as follows:

1. I am a sworn Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI) and an Investigator for the Rochester Police Department (RPD). I have been a member of the Rochester Police Department since May 1998, and assigned to the FBI Child Exploitation Task Force since October 2015. I am responsible for investigating a wide range of local, state, and federal criminal violations. In my position with the FBI Child Exploitation Task Force, I am responsible for investigating crimes against children, including the distribution and possession of child pornography in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(a)(5)(B).

2. This affidavit is submitted for the limited purpose of establishing probable cause to believe that Sean P. BLACKWELL, born xx/xx/1984, did knowingly distribute and possess child pornography that had been shipped or transported using any means or facility of interstate or foreign commerce or had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(a)(5)(B).

3. The information contained in this affidavit is based upon my personal knowledge and observation, my training and experience, conversations with other law enforcement officers and witnesses, and my review of documents, reports and records

gathered through the investigation of this case. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that BLACKWELL did knowingly violate Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(a)(5)(B).

CHILD PORNOGRAPHY AND PEER TO PEER SHARING

4. A continuing phenomenon on the Internet is peer to peer file sharing (hereinafter, "P2P"). P2P file sharing is a method of communication available to Internet users through the use of special software designed specifically to allow users to trade digital files through a worldwide network formed by linking computers together. After installing the P2P software, a user can take certain steps to share files.

5. The computers that are linked together to form the P2P network are located throughout the world; therefore, the P2P network operates in interstate and foreign commerce. A person that shares files containing child pornography is "hosting" child pornography and therefore promoting, presenting, and potentially distributing child pornography, a violation of Title 18, United States Code, Section 2252A(a)(2)(A).

BACKGROUND OF INVESTIGATION

6. On April 30, 2018, your affiant, while acting in an undercover capacity, connected to a certain P2P file-sharing network, using a law enforcement created program, from an Internet-connected computer. While on the network, a device utilizing IP address 172.101.238.9 connected to your affiant's computer. At that point, the law enforcement program downloaded several images of child pornography directly from that device. The

undercover session occurred from 8:02 AM to 8:56 AM on April 30, 2018 EDT, and was designated as UBFR-680. Two of the images are described as follows:

- **Jess and Nina.jpg** – An image of two naked females, who appear to be approximately thirteen years old, sitting on a couch. One of the females is observed with her mouth on the left breast of the other female. The other female's legs are spread, exposing her vagina in a lascivious manner.
- **Liltoy.jpg** – An image of an approximately 11 year old female lying naked on the floor with her legs spread open and her vagina exposed in a lascivious manner.

7. On May 12, 2018, your affiant, while acting in an undercover capacity, again connected to the P2P file sharing network, using a law enforcement created program, from an Internet-connected computer. While on the network, a device utilizing the same IP address, 172.101.238.9, connected to your affiant's computer. At that point, the law enforcement program downloaded a video file containing child pornography. The undercover session occurred at 2:55 PM on May 12, 2018 EDT, and was designated as UBFR-687. The video file is described as follows:

- **14 Kids Teens Women (Porno-Lolitas-Preteens-Reelkiddymov-R@Ygold-Hussyfans-Underage-Females-Children-Pedofillia-Pthc-Ptsc-Xxx-Sexy** – A video file twenty nine minutes and twenty three seconds in length. The video is a compilation of several prepubescent and pubescent females engaging in a wide variety of sexual acts with adult males. The females appear to range from approximately three to fourteen years old. The females are seen having intercourse with adult males and also performing fellatio on adult males and other children.

8. On May 2, 2018 and May 18, 2018 the FBI served administrative subpoenas on Charter Communications requesting the subscriber information for IP address 172.101.238.9. In response, Charter Communications provided the following subscriber information:

**Sue Ellen Blackwell
187 Gates Manor Dr.
Rochester, NY 14606**

9. On May 14, 2018, your affiant conducted physical surveillance at 187 Gates Manor Dr., Rochester, New York 14606. During that surveillance, your affiant observed a 2010 Honda Accord, New York registration HUN6643 parked outside of the residence. The vehicle is registered to "Michael Gary Blackwell" the husband of "Sue Ellen Blackwell."

10. On June 6, 2018 at approximately 10:25 am, your affiant along with other Law Enforcement Officers executed a search warrant at 187 Gates Manor Dr., Rochester, New York. Present at the residence was Sue Blackwell. Sue identified her son, Sean BLACKWELL'S room, from which agents seized multiple electronic devices, including an LG Tablet, FCCID:ZNFV410, which was located on BLACKWELL'S dresser.

11. After the search warrant was executed, your affiant drove back to the FBI Rochester Office and conducted a preview of the seized items, including the above-referenced LG tablet. I observed child pornography to be present on a SanDisk 32GB micro SD card inside the tablet. The child pornography was in a file folder titled "New folder." Some of these files are described as follows:

- **!new! (pthc) (kinderkutje) 11yo loli lebina** – a video approximately 5 minutes and fifteen seconds in length. The video starts out with a prepubescent female sitting on a bed wearing a tank top only. The female is approximately 11 years old. A nude adult male enters the video and the child performs fellatio on the male while he inserts his fingers inside her vagina.
- **Linda 10yo intercourse and Orgasm** – A video approximately 1 minute and forty four seconds in length. The video depicts a 10 year old female engaged in intercourse with an adult male. The child is nude and wearing a black mask. This video is the same video that was observed on February 7, 2018 referenced above, during the undercover session designated as UBFR 672

- **Pthc 9y0** – a video approximately two minutes and one second in length. The video depicts a prepubescent female's vagina. The child's legs are spread and she is subjected to bondage. An adult male then has vaginal and anal sex with the child.

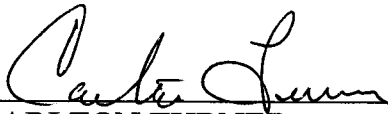
Your affiant observed approximately 30 other videos containing child pornography and over 50 images of child pornography in the same folder titled "New folder." Both the LG tablet and SanDisk 32GB micro SD card bear the trade inscription "MADE IN CHINA." Accordingly, both have traveled in or affecting interstate or foreign commerce.

12. Later, on June 6, 2018 at approximately 6:34 pm your affiant returned to 187 Gates Manor Drive to return some of the seized items that did not contain child pornography back to Sean BLACKWELL. Upon my arrival BLACKWELL was sitting in vehicle outside of the residence. I approached BLACKWELL and explained that he had several items that needed to be returned. I explained to BLACKWELL the SD card found inside his tablet contained child pornography and would not be returned. I then asked BLACKWELL what made him get into child pornography. BLACKWELL replied that he did not want to talk about it. BLACKWELL went on to say he had thought about counseling in the past. BLACKWELL refused to talk about the child pornography any further. I gave BLACKWELL my contact information and asked if he remembered the password for his tablet to which he replied, "I don't remember it!" At that point, I returned several items to BLACKWELL and left the area.

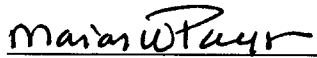
13. On June 13, 2018 your affiant used the Cellebrite UFED Analyzer and was able to complete a more thorough examination of the LG Tablet. I observed approximately 112 images of child pornography and approximately 110 videos containing child pornography during that examination. Some of the videos observed are described as follows:

- **Spanish loli anal-1** – A video approximately two minutes and twelve seconds in length. The video depicts a prepubescent female approximately 10 years old lying on a bed. The female is seen having anal sex with an adult male.
- **Daphne 9YO _Dad Sex** – A video approximately twenty six minutes and forty seven seconds in length. In the video, a prepubescent female performs fellatio on an adult male. As the video continues, the adult male has intercourse with the child.
- **(Pthc) Sally** – Medley Of Scenes (4yo to 8yo) – A video approximately six minutes and forty nine seconds in length. The video is a compilation of scenes of adult males and prepubescent females ranging from 4 to 8 years old engaged in anal or vaginal sex with adult males. The video also shows foreign objects being inserted in to the vaginas and anuses of the children.

14. Based upon the foregoing, your affiant respectfully submits that there is probable cause to believe that SEAN P. BLACKWELL has violated Title 18, United States Code, Section 2252A (a)(2)(A) (distribution of child pornography), and Title 18, United States Code, Section 2252A (a)(5)(B) (possession of child pornography), that had been shipped or transported using any means or facility of interstate or foreign commerce, or had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.


CARLTON TURNER
Task Force Officer
Federal Bureau of Investigation

Sworn to before me this
6 day of July, 2018.


MARIAN W. PAYSON
United States Magistrate Judge